

Joel Piatt
General Motors Corporation – MFD Marion Plant
P. O. Box 778
Marion, IN 46952-0036

Re: 053-13552
First Administrative Amendment to
Part 70 053-6852-00004

Dear Joel Piatt:

General Motors Corporation – MFD Marion Plant was issued a Part 70 Operating Permit on January 19, 1999 for an automotive metal parts source operation. A letter requesting converting a coal fired boiler to natural gas usage was received on December 1, 2000. Pursuant to the provisions of 2-7-11 (a) (8) "Revise descriptive information where the revision will not trigger a new applicable requirement or violate a permit term" the permit is hereby administratively amended. This change involves converting a 76 million Btu per hour boiler presently being fired by coal and waste oil to utilize only natural gas for combustion with maximum capacity of 72 million Btu per hour. The change in the Potential to Emit because of this change is shown in the table below:

Pollutant	Potential to Emit of coal fired 76 million Btu per hour boiler	Potential to Emit after change for natural gas fired 72 million Btu/hour boiler	Change in the PTE.
PM	963.6	0.6	-963
PM10	192.7	2.4	-190.3
SO2	1664.4	0.2	-1664.2
NOx	109.5	31.5	-78
VOC	0.7	1.7	1
CO	87.6	26.5	-61.1

This change in the fuel usage for boiler is considered as a pollution prevention project because it meets the requirements of 326 IAC 2-1.1-1 (14) "...project include any practice that reduces... pollutant ... released into the environment prior to recycling, treatment or disposal. The term includes equipment or technology modifications, process or procedure modifications,....substitution of raw materials..."

This change does not fall in category of Minor Source Modification, as defined in 326 IAC 2-7-10.5 (d) (3) "Modifications involving a ... pollution prevention project as defined in 326 IAC 2-1.1-1 that do not increase the potential to emit any regulated pollutant greater than the thresholds under subdivision (4), ..",

because this modification changes the potential to emit of criteria pollutants below the threshold specified in 326 IAC2-7-10.5 (d)(4).

The Permittee has further stated as follows:

1. The total cost of steam at the Source is insignificant when compared to the total operating cost.

The source has provided cost information for 1999 as follows:

Total steam cost = \$ 1,674,592
Total operating cost = \$ 179,868,000
Steam cost is less than 1% of total operating cost.

2. Climate conditions and not facility production rates primarily determine the steam production.

The Permittee has stated that there are no production processes at the Marion plant that are dependent upon the steam production. Further, steam is produced for employee comfort, cafeteria ovens and maintenance steam cleaning booths only.

Therefore, the conversion to more economical fuel will not affect the utilization rate of the boiler.

The U.S. EPA letter of April 6, 1993, regarding a similar request in Michigan, states that General Motors demonstrated that the change of fuel would not affect future auto production rate. The company provided information on the above two criteria, to show the utilization rate is not affected by change of fuel. Therefore U.S. EPA agreed that this change would not cause any increase in the emissions. Therefore the change should not be considered a major modification under the Federal New Source Review Regulations.

The permit is administratively amended as follows (with text deleted shown with ~~strikeout~~ and added shown in **bold**):

1. Conditions A.2 (1) and D.1 (1) are amended as follows:

- (1) One (1) ~~spreader stoker coal~~ **natural gas** fired boiler, identified as UT-001, rated at ~~76 72~~ MMBtu/hr, ~~equipped with a 3.88 MMBtu/hr waste oil burner, using a multiple cyclone w/o fly ash reinjection for particulate control,~~ and exhausting to stack 1.

2. The section D.1 is amended as follows:

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-2-3] [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from each of the ~~three (3)~~ **two** boilers **UT-002 and UT-003**, shall be limited to 0.48 pounds per MMBtu heat input.

The limitation is based on the following equation:

$$Pt = \frac{C * a * h}{76.5 * Q^{0.75} * N^{0.25}}$$

Where: C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty minute time period.
Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).

- Q = Total source maximum operating capacity rating in mmBtu/hr heat input.
N = Number of stacks in fuel burning operation.
a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 mmBtu/hr heat input.
h = Stack height in feet.

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from boiler UT-001, shall be limited to 0.36 pounds per MMBtu heat input.

The limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

- Where: Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.**
Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 326 7-1.1 (Sulfur Dioxide Emission Limitations), the SO₂ emissions from each of the ~~three~~ **two (32)** boilers **UT-002 and UT-003**, shall not exceed 6.0 pounds per MMBtu heat input.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM and SO₂ limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.5 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 326 IAC 7-2, the Permittee shall demonstrate that the coal sulfur content does not exceed six (6.0) pounds per MMBtu. Compliance shall be determined utilizing one of the following options:

- (a) Coal sampling and analysis shall be performed using one of the following procedures:
- (1) Minimum Coal Sampling Requirements and Analysis Methods [326 IAC 3-7-2(b)(3)]:

- (A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;
 - (B) Coal shall be sampled at least three (3) times per day and at least one (1) time per eight (8) hour period unless no coal is bunkered during the preceding eight (8) hour period;
 - (C) Minimum sample size shall be five hundred (500) grams;
 - (D) Samples shall be composited and analyzed at the end of each calendar month;
 - (E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or
- (2) Sample and analyze the coal pursuant to 326 IAC 3-7-2(a); or
 - (3) Sample and analyze the coal pursuant to 326 IAC 3-7-3; or
- (b) Upon written notification to IDEM by a facility owner or operator, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5-1 may be used as the means for determining compliance with the emission limitations in 326 IAC 7-2. Upon such notification, the other requirements of 326 IAC 7-2 shall not apply. [326 IAC 7-2-1(e)]
 - (c) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6, which is conducted with such frequency as to generate the amount of information required by (a) or (b) above. [326 IAC 7-2-1(b)]

A determination of noncompliance pursuant to either of the methods specified in (a), (b), or (c) above shall not be refuted by evidence of compliance pursuant to the other method.

D.1.6 Particulate Matter

The mechanical multicyclones for PM control shall be in operation at all times when the boilers **UT-002 and UT-003** are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Particulate Matter (PM)

-
- (a) Daily visible emission notations (non-Method 9) of the boilers stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
 - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.8 Multicyclone Inspections

- (a) An inspection shall be performed weekly of the ductwork and annually of the mechanical multicyclones controlling the particulate matter emission from the ~~three~~ **two (32)** boilers **UT-002 and UT-003**. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a leak or abnormal emissions are observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2 and D.1.5, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM and SO₂ emission limits established in D.1.1 and D.1.2.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual coal usage since last compliance determination period;
 - (3) Sulfur content, heat content, and ash content;
 - (4) Sulfur dioxide emission rates.
- (b) Pursuant to 326 IAC 3-7-5(a), owners or operators of sources with total coal-fired capacity greater than or equal to one hundred (100) MMBtu per hour actual heat input shall develop a standard operating procedure (SOP) to be followed for sampling, handling, analysis, quality control. Quality assurance and data reporting of the information collected pursuant to 326 IAC 3-7-2 through 326 IAC 3-7-4. In addition, any revision to the SOP shall be submitted to IDEM, OAM.
- (c) To document compliance with Conditions D.1.7 and D.1.8 the Permittee shall maintain records of daily visible emission notations, weekly inspections of the multicyclone ductwork and annual inspections of the multicyclones..
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

D.1.11 ~~Used Oil Requirements~~

~~The waste oil burned in Boiler UT-001 shall comply with the used oil requirements specified in 329 IAC 13 (Used Oil Management). Pursuant to 329 IAC 13-3-2 (Used Oil Specifications), used oil~~

~~burned for energy recovery that is classified as off-specification used oil fuel shall comply with the provisions of 329 IAC 13-8 (Used Oil Burners Who Burn Off-specification Used Oil For Energy Recovery), including:~~

- ~~_____ (a) Receipt of an EPA identification number as outlined in 329 IAC 13-8-3 (Notification),~~
- ~~_____ (b) Compliance with the used oil storage requirements specified in 329 IAC 13-8-5 (Used Oil Storage), and~~
- ~~_____ (c) Maintaining records pursuant to 329 IAC 13-8-6 (Tracking).~~

~~The burning of mixtures of used oil and hazardous waste that is regulated under 329 IAC 3.1 is prohibited at this source.~~

3. The facility description in Part 70 Quarterly Report form on page 36 of 37 is amended as follows:

Facility: Boilers UT-001, UT-002 and UT-003

4. Table of contents of the Part 70 Permit has been amended accordingly.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gurinder Saini, at (800) 451-6027, press 0 and ask for Gurinder Saini or extension 3-0203, or dial (317) 233-0203.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

GS

cc: File – Grant County
U.S. EPA, Region V
Grant County Health Department
Air Compliance Section Inspector – Jim Thorpe
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**General Motors Corporation, MFD, Marion Plant
2400 West Second Street
Marion, Indiana 46952**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T053-6852-00004	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: January 19, 1999
First Administrative Amendment:053-13552	Pages affected: 3, 4, 28-31, 36
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.10 Compliance Schedule [326 IAC 2-7-6(3)]
- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.13 Monitoring Methods [326 IAC 3]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection

- C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - Three (3) boiler UT-001, UT-002, UT-003

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Particulate Matter (PM) [326 IAC 6-2-3]
- D.1.2 Sulfur Dioxide (SO₂)
- D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.1.5 Sulfur Dioxide Emissions and Sulfur Content
- D.1.6 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.1.7 Particulate Matter (PM)
- D.1.8 Multicyclone Inspections

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.9 Record Keeping Requirements
- D.1.10 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS - Maintenance Spray Booth, MT-001

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Compliance Determination Requirements

- D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.2.3 Particulate Matter (PM)

Certification

Emergency/Deviation Occurrence Report

Quarterly Report

Quarterly Compliance Monitoring Report

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates an automotive metal parts source.

Responsible Official: Joel Piatt
Source Address: 2400 West Second Street, Marion, Indiana 46952
Mailing Address: P.O. Box 778, Marion, Indiana 46952
SIC Code: 3465
County Location: Grant
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) natural gas fired boiler, identified as UT-001, rated at 72 MMBtu/hr, and exhausting to stack 1.
- (2) One (1) spreader stoker coal-fired boiler, identified as UT-002, rated at 96 MMBtu/hr, using a multiple cyclone w/o fly ash reinjection for particulate control, and exhausting to stack 2.
- (3) One (1) spreader stoker coal-fired boiler, identified as UT-003, rated at 96 MMBtu/hr, using a multiple cyclone w/o fly ash reinjection for particulate control, and exhausting to stack 3.
- (4) One (1) air atomized spray paint booth, identified as MT-001, used for maintenance painting, equipped with dry filter to control overspray, and exhausting to stack 4.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (1) One (1) natural gas fired boiler, identified as UT-001, rated at 72 MMBtu/hr, and exhausting to stack 1.
- (2) One (1) spreader stoker coal-fired boiler, identified as UT-002, rated at 96 MMBtu/hr, using a multiple cyclone w/o fly ash reinjection for particulate control, and exhausting to stack 2.
- (3) One (1) spreader stoker coal-fired boiler, identified as UT-003, rated at 96 MMBtu/hr, using a multiple cyclone w/o fly ash reinjection for particulate control, and exhausting to stack 3.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-2-3][326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from each of the two boilers UT-002 and UT-003, shall be limited to 0.48 pounds per MMBtu heat input.

The limitation is based on the following equation:

$$Pt = \frac{C * a * h}{76.5 * Q^{0.75} * N^{0.25}}$$

Where: C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty minute time period.

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in mmBtu/hr heat input.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 mmBtu/hr heat input.

h = Stack height in feet.

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from boiler UT-001, shall be limited to 0.36 pounds per MMBtu heat input. The limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where: Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

D.1.2 Sulfur Dioxide (SO2) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 326 7-1.1 (Sulfur Dioxide Emission Limitations), the SO2 emissions from each of the two (2) boilers UT-002 and UT-003, shall not exceed 6.0 pounds per MMBtu heat input.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM and SO₂ limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.5 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 326 IAC 7-2, the Permittee shall demonstrate that the coal sulfur content does not exceed six (6.0) pounds per MMBtu. Compliance shall be determined utilizing one of the following options:

- (a) Coal sampling and analysis shall be performed using one of the following procedures:
 - (1) Minimum Coal Sampling Requirements and Analysis Methods [326 IAC 3-7-2(b)(3)]:
 - (A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;
 - (B) Coal shall be sampled at least three (3) times per day and at least one (1) time per eight (8) hour period unless no coal is bunkered during the preceding eight (8) hour period;
 - (C) Minimum sample size shall be five hundred (500) grams;
 - (D) Samples shall be composited and analyzed at the end of each calendar month;
 - (E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or
 - (2) Sample and analyze the coal pursuant to 326 IAC 3-7-2(a); or
 - (3) Sample and analyze the coal pursuant to 326 IAC 3-7-3; or
- (b) Upon written notification to IDEM by a facility owner or operator, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5-1 may be used as the means for determining compliance with the emission limitations in 326 IAC 7-2. Upon such notification, the other requirements of 326 IAC 7-2 shall not apply. [326 IAC 7-2-1(e)]
- (c) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6, which is conducted with such frequency as to generate the amount of information required by (a) or (b) above. [326 IAC 7-2-1(b)]

A determination of noncompliance pursuant to either of the methods specified in (a), (b), or (c) above shall not be refuted by evidence of compliance pursuant to the other method.

D.1.6 Particulate Matter

The mechanical multicyclones for PM control shall be in operation at all times when the boilers UT-002 and UT-003 are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Particulate Matter (PM)

- (a) Daily visible emission notations (non-Method 9) of the boilers stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.8 Multicyclone Inspections

- (a) An inspection shall be performed weekly of the ductwork and annually of the mechanical multicyclones controlling the particulate matter emission from the two (2) boilers UT-002 and UT-003. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a leak or abnormal emissions are observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2 and D.1.5, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM and SO₂ emission limits established in D.1.1 and D.1.2.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual coal usage since last compliance determination period;

- (3) Sulfur content, heat content, and ash content;
- (4) Sulfur dioxide emission rates.
- (b) Pursuant to 326 IAC 3-7-5(a), owners or operators of sources with total coal-fired capacity greater than or equal to one hundred (100) MMBtu per hour actual heat input shall develop a standard operating procedure (SOP) to be followed for sampling, handling, analysis, quality control. Quality assurance and data reporting of the information collected pursuant to 326 IAC 3-7-2 through 326 IAC 3-7-4. In addition, any revision to the SOP shall be submitted to IDEM, OAM.
- (c) To document compliance with Conditions D.1.7 and D.1.8 the Permittee shall maintain records of daily visible emission notations, weekly inspections of the multicyclone ductwork and annual inspections of the multicyclones..
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: General Motors Corporation, MMF, Marion Plant
Source Address: 2400 West Second Street, Marion, IN 46952
Mailing Address: P.O. Box 778, Marion, IN 46952
Part 70 Permit No.: T053-6852-00004
Facility: Boilers UT-002 and UT-003
Parameter: SO2
Limit: 6.0 pounds per MMBtu heat input

YEAR: _____

Month	Coal Usage (tons)	Monthly Average Sulfur Content (%)	Monthly Average Ash Content (%)	Monthly Average Heat Content (MMBtu/lb)	SO2 Emission Rate (lbs/MMBtu)
1					
2					
3					
Deviations					

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____